



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

FEB 16 2011

EH & RS
FEB 21 2011

Ms. Mary Lou Capichioni
Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Bridgewood Lake and Railroad Track
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
*Evaluation of Investigation Results and Proposal to Complete Soil
And Sediment Delineation:* dated November 22, 2010

Dear Ms. Capichioni:

The United States Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the following document: "Bridgewood Lake and Railroad Track – Evaluation of Investigation Results and Proposal to Complete Soil and Sediment Delineation", submitted by the Sherwin-Williams Company on November 22, 2010 and offer the following.

Bridgewood Lake Sediment Sampling Comments

EPA and NJDEP have reviewed the available data, along with the proposal for additional sampling, and are making the following recommendations based on Bridgewood Lake (BWL) Transect numbers (below). The rationale for EPA's request for additional sampling is based on Sherwin-Williams decision to not conduct additional characterization of the soft (organic-rich) sediment, but to bolster Sherwin-Williams' statement that metals (and to a lesser extent PAHs, PCBs and pesticides), are not to any significant extent present in the coarser-grained sands and silts. Sherwin-Williams has stated that coarse-grained sands and silts can be generally classified as having total organic carbon (TOC) results that are 3,000 mg/kg and percent solids in the range of 80 percent.

In addition, as a general comment, EPA is requesting that sampling within the sediment be terminated at 4 feet into the coarse-grained material, as opposed to comparing the X-Ray Florescence (XRF) results at this depth to NJDEP Residential Direct Contact Soil Remediation Standards (RDCSRS) and not the Ecological Screening Criteria (ESC). EPA is proposing that for the purposes of this phase of sampling, sampling (up to) 4.0 feet into the coarse-grained

material will be sufficient.

BWL1 – Is approved as proposed.

BWL4 – Is approved as proposed.

BWL7 – EPA is requesting that sample location BWDD0020 (which has an exceedance for arsenic at the 2.5 – 3.0 ft interval) be vertically delineated. The total organic carbon (TOC) and percent solids results for both BWDD0020 and BWDD0013 (which has been proposed for additional delineation) are somewhat similar.

BWL10 - EPA is requesting that sample location BWDD0029 be vertically delineated. This location has an arsenic value that is quite high, yet has a TOC result of 2,590 ppm.

BWL13 – Additional sampling not requested.

BWL14 – Additional sampling not requested.

BWL16 – EPA is requesting that sample location BWDD0040 be delineated into the coarse-grained material, as there is still an exceedance for arsenic and the percent solids and TOC are relatively similar in value to sample location BWDD0043 (which is proposed on transect BWL19).

BWL19 – Is approved as proposed.

BWL20 – EPA is requesting that sample location BWDD0049 be vertically delineated as it has similar TOC and percent solids values as BWDD0043 does.

BWL21 – Additional sampling is not requested.

Bridgewood Lake and Railroad Track Soil Sampling Comments

1. Sample BWSB0053 – Is approved as proposed.
2. Sample BWSB0043 – Is approved as proposed.
3. A new sample midway between BWSB0041 and BWSB0024 – Is appropriate as proposed.
4. Sample BWSB0040 – Is approved as proposed.
5. Sample RRSB0029 – On 2/10/11, EPA RPM conducted a field visit to observe several of the sample locations proposed for collection in the November 22, 2010 report. During the visit, members from Weston utilized a Global Positioning System (GPS) to pin-point both historic and proposed sample locations. In the case of RRSB0029, where it is proposed to place a sample to the east of this location (as near to United States Avenue as

possible without requiring a road closure permit), it was observed that there is no space for a sample to the east (without closing the road). However, sample location RRSB0001 was also located with the GPS and currently EPA is requesting that a soil sample be collected at the mid-point between RRSB0029 and RRSB0001. This “new” location will be in the former rail bed and EPA is requesting that this location be screened to at least 4.0-4.5 below the grade present at RRSB0029. Note, although EPA is not requesting that a sample be placed in the road, there are several samples collected parallel to United States Avenue, outside of the fence-line (samples BSSB0050 – BSSB0054).

6. Sample RRSB0033 – Is approved as proposed. In addition, EPA is requesting that RRSB0028 and RRSB0027 be resampled. This will bolster the data set in this area, which includes several samples which had lead data that was rejected.
7. NJDEP had originally requested that three (3) samples, be collected on each of the 3 “lobes” which are present in the vicinity of Bridgewood Lake Transect 21. During the 2/10/11 site visit by the EPA RPM, members of Weston utilized the GPS unit to identify the soil samples in the vicinity of these “lobes” which are depicted on the various figures. It was identified during the site visit that these lobes do not exist – it is likely that during the very dry summer months, due to the shallow area, that lake vegetation grows, thus giving the appearance from the satellite that “true land” is present. Although there is already sample coverage and a soil sample cannot be collected on each of the 3 lobes, there does appear to be an area which would allow for additional sampling. EPA and the Weston members identified an area between sample location RRSB0004 and BWSB0016 (approximately sixty feet or more) would allow for a sample to be placed in the midpoint.
8. NJDEP is requesting that two soil samples be collected west of the railroad tracks and east of historic sample locations – BWSB0055 and BWSB0056. These samples should be collected midpoint between historic sample locations BWSB0055 and RRSB0012 and midpoint between BWSB0056 and RRSB0011.

Specific Comments

1. Page 6, discussion of BWL7 – Since much of the discussion of the sediment results is based on comparing them to the ESC, the statement should be revised to reflect that BWDD0016 and BWDD0020 approached vertical delineation.
2. Page 7, discussion of BWL10 – Similar to Specific Comment #1, the text should be revised to state that BWDD0024, BWDD0027, and BWDD0029 approached vertical delineation.
3. Page 7, discussion of BWL14 – Similar to Specific Comment #1, the text should be revised to state that vertical delineation was approached at location BWDD0035.
4. Page 7, discussion of BWL16 – Similar to Specific Comment #1, the text should be revised to state that vertical delineation was approached at location BWDD0041.

5. Page 7, discussion of BWL 20 – Similar to Specific Comment #1, the text should be revised to state that vertical delineation was approached at location BWDD0048.

Please submit a revised Work Plan for the activities both discussed in the November 22, 2010 Work Plan and for the elements presented herein, within 30 days of receipt of this comment letter. If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Carole Petersen', with a long horizontal flourish extending to the right.

Carole Petersen, Chief
New Jersey Remediation Branch

cc: Lynn Vogel, NJDEP